



16711/EEP Approval
30 September 2003
D8(m) Policy Ltr 04-2003

MEMORADUM

From: D. R. Ryan
CCGD 8 (m)

A handwritten signature in black ink, appearing to be "D. R. Ryan", written over a horizontal line.

To: Distribution

Subj: OUTER CONTINENTAL SHELF (OCS) EMERGENCY EVACUATION PLAN (EEP)
APPROVALS

1. This policy is issued to improve efficiency and consistency throughout the district for approving Emergency Evacuation Plans (EEPs). Each Officer in Charge, Marine Inspection (OCMI) is encouraged to exercise their authority under 33 CFR 140.15(a) and permit alternate procedures to those specified in 33 CFR Subchapter N, for the submission and approval of EEPs under 33 CFR 146.140 and 146.210.
2. A 12-month review conducted by MSO Port Arthur revealed that the majority of the EEPs submitted were for minor revisions, and only a small percentage were returned to the OCS facility owner/operator for revision or clarification. This low number is partly due to the fact that virtually all of the EEPs submitted are the product of third party contractors. These contractors are familiar with Coast Guard regulations and have tailored their product to meet our requirements. Because of this and the large number of man-hours expended to find a few minor errors, there was little value added in reviewing EEPs that were resubmitted for minor changes.
3. Therefore, under the equivalency provisions of 33 CFR 140.15(a), OCMI's may opt to no longer require review and approval of EEPs that have been submitted due to minor changes in the plan, e.g. movement of an Outer Continental Shelf (OCS) facility within the same OCMI zone where the evacuation procedures remain the same. This policy will apply only to EEPs prepared by entities which have proven their competence with past EEP submittals to the local OCMI that are in compliance with the regulations. OCMI's are to continue to conduct the initial review and approval of EEPs for newly installed manned OCS facilities. All EEPs will continue to be checked in the normal course of platform and MODU inspections, and deficiencies will be reported as CG-835 items.
4. In addition, regional EEPs may be submitted for multiple OCS facilities operated by the same company but located in different geographic locations, as long as the EEP is submitted to each of the cognizant OCMI's for review and approval.

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Dist: All Eighth District Gulf Region MSOs